## PITTA & GIBLIN LLP

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August 26, 2013

## VIA ELECTRONIC & OVERNIGHT MAIL

Antonia Kousoulas, Esq. Kousoulas & Associates P.C. 48 Wall Street, 25<sup>th</sup> Floor New York, New York 10005

Del Valle v. IUOE Local 14-14B

Civil Action No. 10-5210 (MKB) (RLM)

Dear Ms. Kousoulas:

This Firm represents Defendant, the International Union of Operating Engineers Local 14-14B (the "Union"), in connection with the above-referenced matter. Enclosed herewith please find the following documents relating to Defendant's Motion for Summary Judgment:

- (1) Notice of Motion for Summary Judgment Pursuant to Fed. R. Civ. P. 56;
- (2) Local Rule 56.1 Statement of Undisputed Material Facts in Support of Defendant's Motion for Summary Judgment;
- (3) Declaration of Vincent M. Giblin in Support of Defendant's Motion for Summary Judgment Pursuant to Fed. R. Civ. P. 56;
- (4) Memorandum of Law in Support of Defendant's Motion for Summary Judgment;
- (5) Proposed Form of Order; and
- (6) Affidavit of Service.

We will take the necessary action to seal the documents before filing.

Very truly yours,

PITTA & GIBLIN LLP Jewent M. Deblin AME

Vincent M. Giblin

Enclosures